

ORIGINALUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA

SEALED**INDICTMENT**

- v. -

11 CRIM 546MICHAEL VIRTUOSO,
a/k/a "Mike the Butcher," and
DOMINIC CITERA,
a/k/a "Donnie,"

Defendants.

- - - - -x

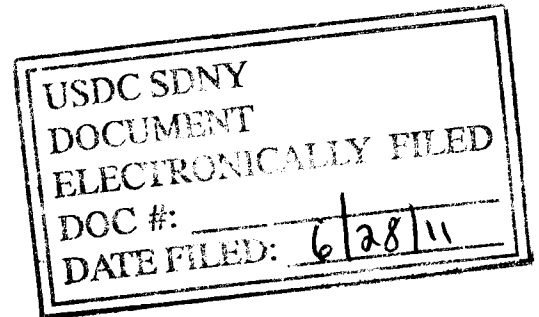
COUNT ONE

The Grand Jury charges:

1. From at least in or about January 2006, up to and including in or about November 2006, in the Southern District of New York and elsewhere, MICHAEL VIRTUOSO, a/k/a "Mike the Butcher," and DOMINIC CITERA, a/k/a "Donnie," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that MICHAEL VIRTUOSO, a/k/a "Mike the Butcher," and DOMINIC CITERA, a/k/a "Donnie," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a



Indigo Valley
 11-11-11

detectable amount of heroin, in violation of 21 U.S.C.

§ 841(b)(1)(A).

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about November 2006, a co-conspirator not named herein ("CC-1") traveled from New Jersey to Brooklyn, New York, through the Southern District of New York, to meet with MICHAEL VIRTUOSO, a/k/a "Mike the Butcher," and DOMINIC CITERA, a/k/a "Donnie," the defendants, to sell heroin.

b. In or about November 2006, MICHAEL VIRTUOSO, a/k/a "Mike the Butcher," and DOMINIC CITERA, a/k/a "Donnie," the defendants, met with CC-1 and purchased approximately 250 grams of heroin from CC-1.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MICHAEL VIRTUOSO, a/k/a "Mike the Butcher," and DOMINIC CITERA, a/k/a "Donnie," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly

or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment.

Substitute Asset Provision

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants --

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value;
- or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. §

853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841 and 853.)

FOREPERSON



PREET BHARARA *jsr*
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MICHAEL VIRTUOSO,
a/k/a "Mike the Butcher," and
DOMINIC CITERA,
a/k/a "Donnie,"

Defendants.

INDICTMENT

11 Cr.

(21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL


Foreperson.

June 26, 2011
Filed Sealed Indictment.
U.S.M.T. Debra Freeman